

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

BLACK LIVES MATTER SEATTLE-
KING COUNTY, ABIE EKENEZAR,
SHARON SAKAMOTO, MURACO
KYASHNA-TOCHA, ALEXANDER
WOLDEAB, AND ALEXANDRA CHEN,

Plaintiffs,

v.

CITY OF SEATTLE,

Defendant.

No. 2:20-cv-887

DECLARATION OF DAVID A. PEREZ IN
SUPPORT OF PLAINTIFFS' RESPONSE
TO MOTION FOR RECONSIDERATION

I, David A. Perez, declare and state as follows:

1. The information contained in this declaration is true and correct to the best of my knowledge, and I am of majority age and competent to testify about the matters set forth herein.

2. I am a partner at Perkins Coie LLP, and I serve as lead counsel for Plaintiffs Black Lives Matter Seattle-King County, Abie Ekenezar, Sharon Sakamoto, Muraco Kyashna-Tochá, Alexander Woldeab, and Alexandra Chen in the above-entitled action. I submit this declaration in support of Plaintiffs' Response to Motion for Reconsideration.

3. Prior to filing its Motion for Reconsideration and Leave to Supplement the Record, the City did not meet and confer with Plaintiffs' counsel—or even *seek to meet and confer*. In fact, the City did not so much as provide Plaintiffs' counsel advance notice of this

1 Motion; the very first time Plaintiffs learned about the motion was when counsel received notice
2 via the ECF system.

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4 Executed this 29th day of December 2020 at Seattle, Washington.

5 I declare under penalty of perjury under the laws of the United States and the State of
6 Washington that the foregoing is true and correct.

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8 By: s/ David Perez

9 DAVID A. PEREZ
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